

STATEMENT OF BASIS

King Kutter
Winfield, Alabama
Marion County
710-0023

On March 24, 2011, the Department received an application to renew the Major Source Operating Permit for King Kutter. No changes to the current permit were requested. Emissions of Volatile Organic Compounds are limited by the permit to 245 tons in any 12 month period. The facility wishes to remain a minor source for Prevention of Significant Deterioration.

King Kutter, in Winfield, is a major source of hazardous air pollutants, which are emitted from the paints used to coat the agricultural machinery produced at this facility. This facility is subject to 40 CFR 63 subpart M, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. The current permit for this facility expires on June 13, 2011.

This proposed Title V Major Source Operating Permit will be issued under the provisions of ADEM Admin. Code R. 335-3-16. The above named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit. King Kutter manufactures agricultural equipment, and has a standard industrial classification code of 3523. Compliance Assurance Monitoring does not apply to this facility because the only air emission control equipment is particulate filters on the paint booths and the unit does not have a potential to emit more than 100 tons per year of particulate.

The only significant sources of air pollutants at this facility are:

- 001 Primer Booth
- 002 Primary Spray Booth
- 003 Primary Dip Tank
- 004 Secondary Dip Tank

This facility is not a major source for prevention of significant deterioration. The original Major Source Operating Permit had no limits. The potential volatile organic compound emission, based on current paint usage, was estimated to be 374 tons per year. King Kutter has requested a 245 tons per year volatile organic compound limit to avoid being a major source with respect to PSD.

Primer Booth

Emissions Standards:

Hazardous Air Pollutant Standard:

This source will be subject to 40 CFR 63 subpart M, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. ADEM Admin. Code R. 335-3-11-.06(90)

Volatile Organic Compound Standard:

This source is subject to a synthetic minor prevention of significant deterioration permit limit of 245 tons of volatile organic compounds in any twelve month period.

Expected Emissions

Expected emissions from this unit are estimated to be 64 tons per year of volatile organic compounds. Potential emissions from this booth could be 117 tons per year of volatile organic compounds if they were not limited by the permit. These estimates are based on actual paint usage and operating hours.

Periodic Monitoring

King Kutter will demonstrate compliance with the Miscellaneous Metal Coating MACT by use of the recordkeeping and reporting procedures found in 40 CFR 63.3910, 40 CFR 63.3920, 40 CFR 63.3930, and 40 CFR 63.3931. Volatile organic compound emissions will also be reported to demonstrate compliance with the permit limit.

Primary Spray Booth**Emissions Standards:****Hazardous Air Pollutant Standard:**

This source will be subject to 40 CFR 63 subpart M, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. ADEM Admin. Code R. 335-3-11-.06(90)

Volatile Organic Compound Standard:

This source is subject to a synthetic minor prevention of significant deterioration permit limit of 245 tons of volatile organic compounds in any twelve month period.

Expected Emissions

Expected emissions from this unit are estimated to be 54 tons per year of volatile organic compounds. Potential emissions from this booth are estimated to be 204 tons per year of volatile organic compounds. These estimates are based on actual paint usage and operating hours.

Periodic Monitoring

King Kutter will demonstrate compliance with the Miscellaneous Metal Coating MACT by use of the recordkeeping and reporting procedures found in 40 CFR 63.3910, 40 CFR 63.3920, 40 CFR 63.3930, and 40 CFR 63.3931. Volatile organic compound emissions will also be reported to demonstrate compliance with the permit limit.

Primary Dip Tank**Emissions Standards:****Hazardous Air Pollutant Standard:**

This source will be subject to 40 CFR 63 subpart M, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. ADEM Admin. Code R. 335-3-11-.06(90)

Volatile Organic Compound Standard:

This source is subject to a synthetic minor prevention of significant deterioration permit limit of 245 tons of volatile organic compounds in any twelve month period.

Expected Emissions

Expected emissions from this unit are estimated to be 3 tons per year of volatile organic compounds. Potential emissions from this booth are estimated to be 4 tons per year of volatile organic compounds. These estimates are based on actual paint usage and operating hours.

Periodic Monitoring

King Kutter will demonstrate compliance with the Miscellaneous Metal Coating MACT by use of the recordkeeping and reporting procedures found in 40 CFR 63.3910, 40 CFR 63.3920, 40 CFR 63.3930, and 40 CFR 63.3931. Volatile organic compound emissions will also be reported to demonstrate compliance with the permit limit.

Secondary Dip Tank

Emissions Standards:

Hazardous Air Pollutant Standard:

This source will be subject to 40 CFR 63 subpart M, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. ADEM Admin. Code R. 335-3-11-.06(90)

Volatile Organic Compound Standard:

This source is subject to a synthetic minor prevention of significant deterioration permit limit of 245 tons of volatile organic compounds in any twelve month period.

Expected Emissions

Expected emissions from this unit are estimated to be 3 tons per year of volatile organic compounds. Potential emissions from this booth are estimated to be 8 tons per year of volatile organic compounds. These estimates are based on actual paint usage and operating hours.

Periodic Monitoring

King Kutter will demonstrate compliance with the Miscellaneous Metal Coating MACT by use of the recordkeeping and reporting procedures found in 40 CFR 63.3910, 40 CFR 63.3920, 40 CFR 63.3930, and 40 CFR 63.3931. Volatile organic compound emissions will also be reported to demonstrate compliance with the permit limit.

In order to demonstrate compliance with the 245 tons per year volatile organic compound limit, the facility is required to monitor their emissions through tracking the amount of volatile organic compounds used in the process. This is found in section five of the unit specific provisos. The semi annual monitoring is consistent with the MACT. The semi-annual reports should include the compliance status as required by general provisos 12 and 21(a), and by 40 CFR 63.3920(a).

I recommend issuing the attached Title V permit following the required public comment period and EPA review. The proposed monitoring is sufficient to demonstrate compliance status.

Hal Brock
Industrial Chemicals Section
Chemical Branch
Air Division
July 15, 2011